

January 13, 2016

Steve Wright
Columbia Falls Aluminum Co. LLC
2000 Aluminum Dr.
Columbia Falls, MT 59912

Cliff Boyd Calbag Resources, LLC 1700 Topaz Dr. Missoula, MT 59808

Subject: CFAC Building 1 Reuse, Repurpose, and Recyclable Waste Determination

Summary Report Review [EPA ID No. MTD057561763; FID 2386]

Dear Messrs. Wright and Boyd:

On January 12, 2016, the Montana Department of Environmental Quality (DEQ) received the final Columbia Falls Aluminum Company (CFAC) Building 1 Reuse, Repurpose, and Recyclable Waste Determination Summary Report (Report). The purpose of this Report is to verify that there is no hazardous waste on the reuse, repurpose, and recyclable materials ("reusable materials") in Building 1. The Report includes information on testing of dust and debris which have the potential to contaminate the reusable materials with hazardous waste. This Report is a required component of the Waste Management Plan (Plan) which is required per the Administrative Order on Consent (AOC), Paragraph 18.

DEQ has reviewed and approved the Report subject to the following:

- 1. This approval only allows removal of approved materials, as listed in the Report, from Building 1.
- 2. No hazardous waste may be removed from Building 1 until the Plan is approved by DEQ.
- No materials may be removed from the north end crane bay between Pot Lines 6-8 until the Plan has been approved.
- 4. No building components may be removed if removal has the potential to compromise the integrity of the containment building. The containment building must meet all applicable requirements of 40 CFR 264 Subpart DD Containment Buildings.
- 5. Neither the AOC nor the Plan, once approved by DEQ, are intended to permit CFAC and Calbag Resources, LLC. (Calbag) to leave hazardous waste from the Pot Room building on the CFAC property. Additional cleanup may be required under other regulatory authorities.

Steve Wright and Cliff Boyd CFAC Plan Review January 13, 2016 Page 2 of 2

This letter does not constitute Plan approval. CFAC and Calbag may not implement the Plan until they receive written approval of the Plan from DEQ.

If you have any questions, please contact me at (406) 444-1435.

Sincerely,

Cory Mikita

Environmental Science Specialist

Hazardous Waste Section

Waste and Underground Tank Management Bureau

1520 E. 6th Ave, Helena, MT 59620

406-444-1435

cmikita@mt.gov

cc via email: Carol Schmidt/Norm Mullen/Katherine Haque-Hausrath, DEQ Legal

Mark Hall/Ed Thamke, DEQ HW

Mike Rieger, DEQ ENDF Lisa Peterson, DEQ PIO

Jenny Chambers, DEQ REM

Jim Perris, Calbag Resources, LLC

Katy Norris, Tetra Tech